

What happened to Montenegro's complaint due to the negative impact on the environment of the Buk Bijela project?

In May 2019, the NGO Green Home sent a request to the Ministry of Sustainable Development and Tourism, as well as the Water Council to take steps to participate in the transboundary environmental impact assessment of HPP Buk Bijela on the Drina River, ie joint accession to the ESPOO Convention Secretariat. for the possible impacts of these projects on Montenegro.

In addition to the "Buk Bijela" project, the plan includes three other smaller projects: HPP "Foca" of 44 MW, HPP "Paunci" of 43 MW and HPP "Sutjeska" of 44 MW, said Natasa Kovacevic from this NGO. She said that the Water Council expressed its readiness to contribute with professional work, but unfortunately the Ministry of Sustainable Development never sent the requested request, although a year later in May 2020 the complaint of non-governmental organizations from Montenegro and BiH was adopted and the complaint process started in Geneva. in front of the ESPOO Convention Implementation Committee. However, under the provisions of the Espoo Convention, only the governments of the Member States can participate in the most relevant appropriate international procedures to ensure proper assessment and mitigate the possibility of cross-border damage. She added that the committee had previously stated that the signatory states should limit the time validity of permits. especially if in the meantime there has been a change in the state of the environment, advances in scientific knowledge, as well as relevant developments within the legal framework.

Kovacevic says that first of all, the essential obligation of the competent authorities to assess the direct and indirect impacts of the project on certain factors listed in the Directive are in line with new environmental issues, such as resource efficiency and sustainability, biodiversity protection, climate change, major disaster risks and / or natural disasters, as essential elements in the decision-making process.

She said that in 2015, a study was published that classifies the Drina River and its main tributaries as key biodiversity areas, such as the Lim and Tara rivers, designated as the longest habitat for the endangered trout species *Hucho hucho*, which inhabits 553km of watercourses as much as 30% of the total young population of the Balkans.

Earlier research has documented that skobalj and mladica can migrate more than 50 km within the Danube basin, which means that the area around the planned hydropower plant most likely serves as a spawning and breeding area for most fish species living in the Tara canyon, and the construction of a hydropower plant on the Drina most likely to have a high and direct impact on the population of fish species in the Tara River.

As no studies have been conducted so far on the migration of these fish species in these parts of the basin, a proper understanding of these migration regimes is imperative in order

What happened to Montenegro's complaint due to the negative impact on the environment of the Buk Bijela project?

to best understand the impact of HPP Buk Bijela on the Tara River ecosystem permits based on the old Environmental Impact Assessment Study calls into question the validity of the Study itself in accordance with the legal understandings of the Espoo Convention, taking into account the passage of time since its initial development, as well as significant changes in the regulatory system and new environmental findings. It is important to emphasize that the cross-border impact assessment procedure conducted in 2012/2013 was not of a formal nature due to the fact that the competent authority in Republika Srpska did not formally inform the authorities in Montenegro about the planned project. neither the official position of Montenegro was obtained, nor was the final decision on the project sent and the authorities in Montenegro, official cross-border consultations from 2012/2013. years have not been implemented in accordance with the Convention. Due to all the above, we demand once again from the relevant Ministry to submit a notification of compliance with the ESPOO Convention, so as to allow full application of the provisions of the Convention and properly assess the potential damage to the environment. Only after we understand the extent of the damage, we will be able to assess whether the HPP construction project is acceptable for the environment, and if so, we will establish mitigation measures in order to protect the environment of Montenegro, "Kovacevic concluded.

Source: vijesti.me